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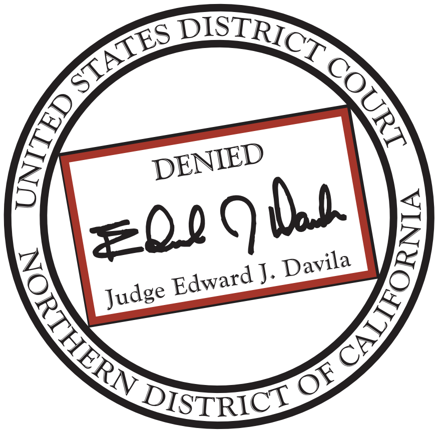

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

AMY LE TONG, an individual, PLAINTIFF, v. AT&T MOBILITY SERVICES LLC, a Delaware Limited Liability Company; and DOES 1-100, jointly and severally, DEFENDANTS.	**CASE NO: CV11-04651-EJD** **STIPULATION AND ~~[PROPOSED]~~ ORDER COORDINATING CASES FOR PRETRIAL PURPOSES** **Date:** March 16, 2012 **Time:** 10:00 a.m. **Dept.:** Courtroom 1 **Judge:** Honorable Edward J. Davila

Subject to the Court's review and approval, IT IS HEREBY STIPULATED AND AGREED AND ORDERED as follows:

WHEREAS, this case is one of approximately 93 pending cases which Plaintiff's counsel has filed throughout the United States District Courts in California against Defendant AT&T Mobility Services LLC on behalf of current or former employees based on allegations of unpaid overtime compensation and violations of the Fair Labor Standards Act. Currently, Plaintiff's counsel has 11 such cases pending in the United States District Court for the Northern District of California.

WHEREAS, the related actions (collectively, the "Actions") listed in Exhibit 'A' are pending in the United States District Court for the Northern District of California; and,

WHEREAS, counsel for the various Plaintiffs and Defendant have each concluded that it is in the best interests of the respective parties that the Actions be coordinated for pretrial purposes, and proceed as contemplated herein. Although Defendant has not yet appeared in this action, Defendant will be represented by the firm of Crowell & Moring LLP. That has been confirmed by Andrew Bagley, Esq. and Wendy Sugg, Esq. of Crowell & Moring LLP. Crowell & Moring, on behalf of AT&T Mobility Services LLC, has stipulated to the terms provided herein;

WHEREAS, it is anticipated that additional related actions may be transferred to, removed to, or filed in this Court; and,

WHEREAS, the existence of certain common questions of law and/or fact in the Actions now pending before this Court, the interests of fair and efficient administration of the Actions, the avoidance of unnecessary duplicative efforts and the avoidance of inconsistency in outcomes, warrants the pretrial coordination of the Actions.

NOW, THEREFORE, subject to the Court's approval, Plaintiff and Defendant, by and through their counsel of record, respectfully asks the following:

(1) All Northern District Actions be coordinated for pretrial purposes to Judge Thelton E. Henderson, who has been assigned the first-filed case (CV11-04508-TEH).

(2) All Actions will adopt the due dates of the first-filed case number for Status Reports, Conferences, and other matters.

GREEN BRYANT & FRENCH, LLP

Dated: January 3, 2012

/s/ Joel R. Bryant
Joel R. Bryant, Esq.
Jbryant@gbflawyers.com
Attorney for Plaintiff
AMY LE TONG

CROWELL & MORING LLP

Dated: January 3, 2012

/s/ Wendy A. Sugg
Wendy A. Sugg
WSugg@crowell.com
Attorney for Defendant
AT&T Mobility Services LLC

ORDER

Pursuant to Stipulation, it is hereby ordered that:

(1) All Northern District Actions be coordinated for pretrial purposes before Judge Thelton E. Henderson, who has been assigned the first-filed case (CV11-04508-TEH).

(2) All Actions will adopt the due dates of the first-filed case number for Status Reports, Conferences, and other matters.

UNITED STATES DISTRICT COURT
DENIED
Judge Edward J. Davila
NORTHERN DISTRICT OF CALIFORNIA

Dated: ________________________ ________________________

The Honorable Edward J. Davila
United States District Court Judge

ATTESTATION

I, Joel R. Bryant, am the ECF user whose identification and password are being used to file the STIPULATION AND [PROPOSED] ORDER COORDINATING CASES FOR PRETRIAL PURPOSES. In compliance with General Order 45.X.B, I hereby attest that Wendy A. Sugg has concurred in this filing.

GREEN BRYANT & FRENCH, LLP

Dated: January 3, 2012

/s/ Joel R. Bryant
Joel R. Bryant, Esq.
Jbryant@gbflawyers.com
Attorney for Plaintiff
AMY LE TONG

EXHIBIT A

Plaintiff Name	Date Filed	Case No.	Judge
Carmen Cruz	09/12/11	3:11:CV-04508-TEH	Thelton E. Henderson
Tuan Nguyen	09/20/11	3:11:CV-04653-CRB	Charles R. Breyer
Colby Diez	09/20/11	5:11-CV-04652-EJD	Edward J. Davila
Amy Le Tong	09/20/11	5:11:CV-04651-EJD	Edward J. Davila
Alesia Ibe	09/20/11	3:11-CV-04658-EMC	Edward M. Chen
Christine Gutierrez	09/20/11	3:11-CV-04549-JSW	Jeffrey S. White
Mahsa Afsharpour	09/20/11	5:11:CV-04656-LHK	Lucy H. Koh
James Gubatan	09/20/11	5:11-CV-04655-LHK	Lucy H. Koh
Richard Ng	09/20/11	5:11-CV-04654-LHK	Lucy H. Koh
Natasha Piper	09/20/11	3:11-CV-04550-SI	Susan Illston
Jermaine McClain	10/17/11	5:11:CV-05072-EJD	Edward J. Davila